

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

**UNITED STATES OF AMERICA**  
*ex rel.* **Brook Jackson,**

**Plaintiff,**

**v.**

**VENTAVIA RESEARCH GROUP, LLC;  
PFIZER INC.; ICON PLC,**

**Defendants.**

**CASE NO. 1:21-CV-00008-MJT**

**VENTAVIA RESEARCH GROUP, LLC’S NOTICE OF JOINDER  
IN PFIZER’S MOTION TO CONTINUE DISCOVERY DEADLINES**

Under Federal Rule of Civil Procedure 10(c), Defendant Ventavia Research Group, LLC (“Ventavia”) hereby joins in and adopts by reference Pfizer’s *Motion to Continue Discovery Deadlines* (Dkt. 78). As outlined in Pfizer’s motion, it makes sense to continue the discovery deadlines at the very least because briefing on the motions to dismiss took longer than anticipated. Further, as Ventavia has previously stated, this is an appropriate case to stay all discovery unless and until the Court determines that Relator has stated a viable claim for relief (Dkt. 55). Given the serious pleading deficiencies identified by the Defendants and the United States, allowing any discovery would amount to the kind of impermissible and unnecessary fishing expedition that Rule 9(b) is designed to prevent. That is especially true in light of the discovery burden that will inevitably be imposed on the parties, the government, and others in this case, including because of the need for the parties to carefully weigh concerns about the privacy rights of individuals who participated in the clinical trials and to take extra steps to protect those participants’ personal and protected information. Ventavia joins Pfizer in respectfully requesting that the Court grant a three-

month continuance of the discovery deadlines to March 15, 2023 or another appropriate date of the Court's choosing.

Respectfully submitted,

/s/ Stacy L. Brainin

Stacy L. Brainin

Texas Bar No. 02863075

Andrew W. Guthrie

Texas Bar No. 24078606

Taryn M. McDonald

Texas Bar No. 24088014

HAYNES AND BOONE, LLP

2323 Victory Avenue, Suite 700

Dallas, Texas 75219

Tel: (214) 651-5000

Fax: (214) 651-5940

stacy.brainin@haynesboone.com

andrew.guthrie@haynesboone.com

taryn.mcdonald@haynesboone.com

**COUNSEL FOR VENTAVIA**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all counsel of record on November 28, 2022, pursuant to the Court's ECF filing system and the Federal Rules of Civil Procedure.

/s/ Stacy L. Brainin

Stacy L. Brainin